

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

ESTATE OF FATIMA NEAL, et al

*

Plaintiffs

*

v.

* Case no.: 15-CV-03278-ELH

STATE OF MARYLAND, et al

*

Defendants

*

* * * * *

CONSENT MOTION TO MODIFY SCHEDULING ORDER

Defendants, Wexford Health Sources, Inc. (“Wexford”) and Elizabeth Obadina, Andria Wiggins, Ebere Ohaneje, Anike Ajayi, Najma Jamal, Karen McNulty, Jocelyn El-Sayed, Getachew Afre, and Oby Atta (collectively the “Individual Medical Defendants”), by and through their attorneys, J. Michael Sloneker and Megan J. McGinnis, file this Consent Motion to Modify Scheduling Order, and state as follows:

1. Under the initial Scheduling Order issued by this Court on April 19, 2016, the discovery deadline in this case was June 30, 2017, and the dispositive pretrial motions deadline was July 31, 2017. (ECF No. 44).

2. On June 19, 2017, the Court extended the discovery deadline to August 15, 2017. It did not issue a corresponding extension of the dispositive pretrial motions deadline, which remains July 31, 2017, fifteen days before the discovery deadline.

3. The parties have not yet completed depositions of the rebuttal experts that Plaintiff disclosed on June 19, 2017 (timely disclosed by agreement of the parties), and those depositions as well as other discovery which may take place in advance of the August 15, 2017 discovery deadline may be necessary for the parties to fully brief dispositive pretrial motions.

4. Accordingly, under Federal Rule of Civil Procedure 16(b)(4), good cause exists to modify the scheduling order to extend the dispositive pretrial motions deadline to September 15, 2017.

5. No party will be prejudiced by this modification, and in fact, all parties will be prejudiced if the modification is not granted.

6. All parties have consented, through counsel, to the modification requested herein.

WHEREFORE, Wexford and the Individual Medical Defendants respectfully request that the Court extend the dispositive pretrial motions deadline to September 15, 2017.

Respectfully Submitted,

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Certificate of Service

I HEREBY CERTIFY that on this 5th day of July, 2017 a copy of the foregoing Defendants' Consent Motion to Modify Scheduling Order and proposed Order were served via electronic mail and/or via first class mail to:

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